

REMARKS

In the above-noted Final Official Action, claim 9 was again rejected under 35 U.S.C. §103(a) over MORRISEY et al. (U.S. Patent No. 5,524,146) in view of BRESLIN (ex parte letter and comments from Bell Atlantic submitted to the Federal Communications Commission on August 2, 1999) and further in view of DOWENS (U.S. Patent No. 5,559,857). Claims 10-13 were rejected under 35 U.S.C. §103(a) over MORRISEY in view of BRESLIN and DOWENS, and further in view of PELTZ-STRAUSS (ex parte letter and comments from the National Association of the Deaf submitted to the Federal Communications Commission on August 2, 1999). Claims 1 and 14 were rejected under 35 U.S.C. §103(a) over MORRISEY in view of BRESLIN and further in view of FCC CC Docket No. 92-105. Claims 3-4 were rejected under 35 U.S.C. §103(a) over MORRISEY in view of BRESLIN, in view of FCC CC Docket No. 92-105, and further in view of PELTZ-STRAUSS. Claims 2 and 5-8 were rejected under 35 U.S.C. §103(a) over MORRISEY in view of BRESLIN, in view of FCC CC Docket No. 92-105, and further in view of KEATING et al. (comments from the Association of Public-Safety Communications Officials-International and the National Emergency Number Association submitted to the Federal Communications Commission September 14, 1998).

Upon entry of the present amendment, claims 1-14 will have been canceled

without prejudice or disclaimer of the subject matter recited therein. Accordingly, Applicants respectfully submit that the rejection of claims 1-14 has been rendered moot. Claims 15-28 will have been added for the Examiner's consideration.

The outstanding Final Official Action asserts that FCC Docket No. 92-105 discloses or suggests forwarding an automatic number identification (ANI) to a telecommunications relay service center. In this regard, Applicants note that FCC Docket No. 92-105 is a transcript of a public forum on 711 Access to Telecommunications Relay Service. During the public forum on 711 Access, a representative of Bell Atlantic/Verizon (Richard Ellis, Director of Strategic Alliances, Bell Atlantic), responded in the affirmative to a question as to whether ANI of a caller was provided to a telecommunications relay service center in a test implementation.

Initially, Applicants note that the above-noted document was not applied in any rejection until the Final Official Action, although a feature of providing information to a telecommunications relay service center was recited in at least one claim as originally filed. Accordingly, Applicants respectfully submit that the finality of the Final Official Action is improper, at least because the above-noted document was first applied in a Final Official Action to a feature that was present in at least one claim as filed (i.e., the new rejection that applied the FCC document was not necessitated by Applicants' amendments).

Applicants further note that the above-noted FCC document is the only evidence present in the record as to ANI being previously provided to a telecommunications relay service center. In this regard, Applicants note that some question exists as to the meaning of the oral response provided by Mr. Ellis in the public forum. For example, as is described in the “Background” section of the present application at paragraph [0007], “current Advance Intelligent Network Methods... do not reliably forward the identifying information to the telecommunications relay service center”. As a result of the problems described in the Background, Applicants believe that, prior to the present invention, during the initial implementations of the 7-1-1 service, some callers were being instructed to dial toll-free numbers directly (rather than 7-1-1) because identifying information was not reliably forwarded when 7-1-1 was used. Accordingly, Applicants believe that identification information for at least some callers was not being provided to telecommunications relay service centers. However, in order to advance prosecution of the present application, Applicants have taken Mr. Ellis' statement during the FCC forum as true in at least a literal sense.

In this regard, Applicants have rewritten the claims to more clearly recite the features of the present invention that overcome deficiencies in the conventional art. In this regard, as is described at paragraphs [0025] and [0054] of the present application, the information that is presented to a telecommunications relay service center depends on the

type of feature group D trunk line used in the connection between a switch and the telecommunications relay service center. This feature of the present invention reliably provides identification information to the telecommunications service center for signaling switching 7 and multifrequency. Accordingly, with respect to new claims 15-28, Applicants submit that there is no evidence in the cited prior art that at least charge number information was provided to a telecommunications relay service center over a signaling system 7 feature group D trunk line.

In other words, because different types of feature group D trunk lines have different capabilities, 7-1-1 software system that was designed only to provide ANI information to a 3rd party cannot be considered a complete solution. Therefore, Applicants respectfully submit that the failure to provide the CN information for SS7 feature group D trunks lines led to problems as described in the “Background” section of the present application (e.g., because ANI information is not necessarily available in some cases where CN information is available).

Accordingly, Applicants respectfully submit that the references applied by the Examiner do not disclose or suggest providing a charge number depending on the type of trunk line used in a connection to a telecommunications relay service center. Further, Applicants respectfully submit that it would not have been obvious to modify the conventional systems, insofar as modifications may have required significant investments

in new telecommunications infrastructure in providing different types of trunk lines and/or software programming.

Applicants note that claims 15, 24 and 27 each recite features of the present invention as described above. Applicants further submit that claims 16-23, 25-26 and 28 are allowable at least for depending, directly or indirectly, from an allowable independent claim, as well as for reasons related to their own recitations. Accordingly, Applicants respectfully request withdrawal of the outstanding rejections, entry of claims 15-28, and an indication of the allowability of each of the claims now pending.

As noted above, Applicants submit that the finality of the above-noted Final Official Action is improper, at least because the above-noted FCC document was first applied in the Final Official Action to features that were recited in at least one of the original independent claims. Applicants further submit that the addition of claims 15-28 does not present new issues for consideration, at least because providing a charge number (CN) to a telecommunications relay service center, as is recited in the new independent claims, is a feature previously recited in one or more cancelled claims. Accordingly, Applicants respectfully submit that entry of the new claims would not present new issues for the Examiner to consider. Accordingly, Applicants respectfully submit that consideration of the newly added claims is proper, although the present amendments are being submitted after final rejection.

SUMMARY AND CONCLUSION

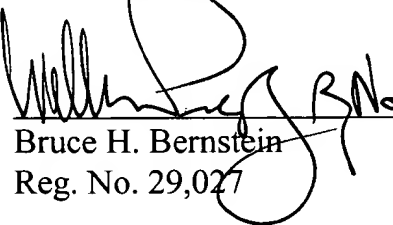
Applicants have made a sincere effort to place the present application in condition for allowance, and believe that they have now done so. Applicants have submitted new claims to more clearly recite the features of the present invention. Furthermore, Applicants have discussed the features recited in Applicants' claims and have shown how these features are not taught, disclosed nor rendered obvious by the references cited in the Final Official Action.

Any new claims which have been added in this amendment, and which have not been specifically noted to overcome a rejection based upon the prior art, should be considered to have been made for a purpose unrelated to patentability, and no estoppel should be deemed to attach thereto.

Should there be any questions or comments regarding this Response, or the present application, the Examiner is invited to contact the undersigned at the below-listed number.

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